



CHARLES COUNTY GOVERNMENT
Department of Emergency Services

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January 20, 2010

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Director

911 Fire EMS
Communications

Animal Control

Emergency Management

Emergency Medical
Services

False Alarm Reduction Unit
(FARU)

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW Room TW-A325

Attn: Wireless Telecommunications Bureau

Re: Reply Comments WT Docket 09-217

Dear Ms. Dortch:

Contrary to several of the comments filed in this proceeding, there is significant public safety interest in private two-way paging. Charles County, Maryland has similar interest in improving its ability to alert public safety first-responders such as Fire, EMS, Emergency Management, and Sheriff's Office personnel through two-way paging technology, but we simply have no realistic way to currently achieve this goal due to the lack of available spectrum. Charles County is aware of the two-way paging system operated by the City of Richmond, VA, and the capabilities of a two-way paging system are quite attractive to the County.

Although the City of Richmond has a 337(c) waiver allowing them use of a regional NPCS channel for their two-way paging needs, Charles County has no such option. Even if Charles County were in the footprint of the Richmond regional channel, we realize that it took Richmond over a year and numerous face-to-face meetings at the FCC to get their license. Compared to the licensing process for a one-way paging system or a voice system, the timetable experienced in Richmond is just too burdensome and protracted for the County to more aggressively pursue private two-way paging. Mr. Verdouw of Monroe County, NY, correctly stated in his letter that it is difficult-to-impossible for local governments to embark on such a campaign to get 900 MHz spectrum for any kind of two-way alerting system.

Another significant issue is whether to invest in a technology, regardless of how applicable, if it is not part of the national public safety plan. If Charles County were to utilize the 337(c) process to acquire spectrum for a stand-alone private system, the County would severely limit future options for interoperability with neighboring jurisdictions. In our collective opinion, this interoperability limitation gets at the core of the problem NPSTC is trying to solve. The FCC needs to swiftly enact spectrum policy that allows public safety to implement and use private two-way paging systems, just as it has already done for one-way paging.

Public safety is a major and loyal user of private paging. The current spectrum policy relegates public safety to twenty-year old one-way paging technology with no ability to receive feedback on the current status of first responders and mission critical field workers. To assert that public safety has no interest in deploying private two-way paging technology is factually untrue and myopic in perspective. Please support NPSTC so that it may achieve its goals in this very serious public safety matter.

Sincerely



Tony Rose
911 Chief

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